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Attorneys for Asha Defendants

UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA

CHINA CENTRAL TELEVISION, a
China company, et al.

Plaintiffs,

v.

CREATE NEW TECHNOLOGY, (HK)
LIMITED, A Hong Kong Company, et
al.,

Defendants.

Case No. 2:15-cv-01869-MMM
Hon. Margaret M. Morrow

ASHA MEDIA DEFENDANTS'
ANSWER TO COMPLAINT AND AFFIRMATIVE DEFENSES

NOW COME Defendants, ASHA MEDIA GROUP, INC., and AMIT

1 BHALLA (hereinafter and collectively “ASHA”) by and through their counsel,
2 Mark G. Clark of Traverse Legal, PLC, and for their Answer to Plaintiffs’
3 Complaint, states as follows:
4

5 NATURE OF THE ACTION

6 1. As to paragraph 1, the ASHA Defendants neither admit nor deny the
7 allegations for lack of knowledge and therefore deny the allegations and therefore
8 leave Plaintiffs to their proofs.
9

10 2. As to paragraph 2, the ASHA Defendants neither admit nor deny the
11 allegations for lack of knowledge and therefore deny the allegations and therefore
12 leave Plaintiffs to their proofs.
13

14 3. As to Paragraph 3, the ASHA Defendants neither admit nor deny the
15 allegations for lack of knowledge and therefore deny the allegations and therefore
16 leave Plaintiffs to their proofs.
17

18 4. As to paragraph 4, the ASHA Defendants neither admit nor deny the
19 allegations for lack of knowledge and therefore deny the allegations and therefore
20 leave Plaintiffs to their proofs.
21

22 5. As to paragraph 5, the ASHA Defendants neither admit nor deny the
23 allegations for lack of knowledge and therefore deny the allegations and therefore
24 leave Plaintiffs to their proofs.
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26 6. As to paragraph 6, the ASHA Defendants neither admit nor deny the
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1 allegations for lack of knowledge and therefore deny the allegations and therefore
2 leave Plaintiffs to their proofs.

3
4 7. As to paragraph 7, the ASHA Defendants neither admit nor deny the
5 allegations for lack of knowledge and therefore deny the allegations and therefore
6 leave Plaintiffs to their proofs.

7
8 8. As to paragraph 8, the ASHA Defendants neither admit nor deny the
9 allegations for lack of knowledge and therefore deny the allegations and therefore
10 leave Plaintiffs to their proofs.

11
12 9. As to paragraph 9, the ASHA Defendants neither admit nor deny the
13 allegations for lack of knowledge and therefore deny the allegations and therefore
14 leave Plaintiffs to their proofs.

15
16 10. As to paragraph 10, the ASHA Defendants neither admit nor deny
17 the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.

19
20 11. As to paragraph 11, the ASHA Defendants neither admit nor deny
21 the allegations for lack of knowledge and therefore deny the allegations and
22 therefore leave Plaintiffs to their proofs.

23
24 12. As to paragraph 12, the ASHA Defendants neither admit nor deny
25 the allegations for lack of knowledge and therefore deny the allegations and
26 therefore leave Plaintiffs to their proofs.

1 13. As to Paragraph 13, the Asha Media Defendants admit that Asha
2 Media advertises and sells the TVpad device in the United States but neither
3 admits nor denies the balance of the allegations for lack of knowledge and leaves
4 Plaintiffs to their proofs.
5

6 14. As to paragraph 14, the ASHA Defendants neither admit nor deny
7 the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs.
9

10 15. As to paragraph 15, the ASHA Defendants neither admit nor deny
11 the allegations for lack of knowledge and therefore deny the allegations and
12 therefore leave Plaintiffs to their proofs.
13

14 16. As to paragraph 16, the ASHA Defendants neither admit nor deny
15 the allegations for lack of knowledge and therefore deny the allegations and
16 therefore leave Plaintiffs to their proofs.
17

18 17. As to paragraph 17, the ASHA Defendants neither admit nor deny
19 the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.
21

22 18. As to paragraph 18, the ASHA Defendants neither admit nor deny
23 the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.
25

26 19. As to paragraph 19, the ASHA Defendants neither admit nor deny
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1 the allegations for lack of knowledge and therefore deny the allegations and
2 therefore leave Plaintiffs to their proofs.

3
4 20. As to paragraph 20, the ASHA Defendants neither admit nor deny
5 the allegations for lack of knowledge and therefore deny the allegations and
6 therefore leave Plaintiffs to their proofs.

7
8 21. As to paragraph 21, the ASHA Defendants neither admit nor deny
9 the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.

11
12 22. As to paragraph 22, the ASHA Defendants admit the allegations
13 therein.

14
15 23. As to paragraph 23, the ASHA Defendants deny the allegations
16 contained therein for the reason that Defendant Bhalla resides in Florida.

17
18 24. As to paragraph 24, the ASHA Defendants neither admit nor deny
19 the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.

21
22 25. As to paragraph 25, the ASHA Defendants neither admit nor deny
23 the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.

25
26 26. As to paragraph 26, the ASHA Defendants neither admit nor deny
27 the allegations for lack of knowledge and therefore deny the allegations and
28

1 therefore leave Plaintiffs to their proofs.

2 27. As to paragraph 27, the ASHA Defendants neither admit nor deny
3 the allegations for lack of knowledge and therefore deny the allegations and
4 therefore leave Plaintiffs to their proofs.
5

6 28. As to paragraph 28, the ASHA Defendants neither admit nor deny
7 the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs.
9

10 29. As to paragraph 29, the ASHA Defendants neither admit nor deny
11 the allegations for lack of knowledge and therefore deny the allegations and
12 therefore leave Plaintiffs to their proofs.
13

14 30. As to paragraph 30, the ASHA Defendants neither admit nor deny
15 the allegations for lack of knowledge and therefore deny the allegations and
16 therefore leave Plaintiffs to their proofs.
17

18 31. As to paragraph 31, the ASHA Defendants neither admit nor deny
19 the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.
21

22 32. As to paragraph 32, the ASHA Defendants neither admit nor deny
23 the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.
25

26 33. As to paragraph 33, the ASHA Defendants neither admit nor deny
27
28

1 the allegations for lack of knowledge and therefore deny the allegations and
2 therefore leave Plaintiffs to their proofs.
3

4 34. As to paragraph 34, the ASHA Defendants neither admit nor deny
5 the allegations for lack of knowledge and therefore deny the allegations and
6 therefore leave Plaintiffs to their proofs.
7

8 35. As to paragraph 35, the ASHA Defendants neither admit nor deny
9 the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.
11

12 36. As to paragraph 36, the ASHA Defendants neither admit nor deny
13 the allegations for lack of knowledge and therefore deny the allegations and
14 therefore leave Plaintiffs to their proofs.
15

16 37. As to paragraph 37, the ASHA Defendant admit that the court has
17 subject matter jurisdictional over Plaintiffs' federal claims but neither admit nor
18 deny the balance of the allegations for lack of knowledge and therefore, leave
19 Plaintiffs to their proofs.
20

21 38. As to paragraph 38, the ASHA Defendants neither admit nor deny
22 the allegations for lack of knowledge and therefore deny the allegations and
23 therefore leave Plaintiffs to their proofs.
24

25 39. As to paragraph 39, the ASHA Defendants neither admit nor deny
26 the allegations for lack of knowledge and therefore deny the allegations and
27
28

1 therefore leave Plaintiffs to their proofs.

2 40. As to paragraph 40, the ASHA Defendants neither admit nor deny
3 the allegations for lack of knowledge and therefore deny the allegations and
4 therefore leave Plaintiffs to their proofs.
5

6 41. As to paragraph 41, the ASHA Defendants neither admit nor deny
7 the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs and further that the exhibits speak for
9 themselves.
10

11 42. As to paragraph 42, the ASHA Defendants neither admit nor deny
12 the allegations for lack of knowledge and therefore deny the allegations and
13 therefore leave Plaintiffs to their proofs.
14

15 43. As to paragraph 43, the ASHA Defendants neither admit nor deny
16 the allegations for lack of knowledge and therefore deny the allegations and
17 therefore leave Plaintiffs to their proofs.
18

19 44. As to paragraph 44, the ASHA Defendants neither admit nor deny
20 the allegations for lack of knowledge and therefore deny the allegations and
21 therefore leave Plaintiffs to their proofs.
22

23 45. As to paragraph 45, the ASHA Defendants neither admit nor deny
24 the allegations for lack of knowledge and therefore deny the allegations and
25 therefore leave Plaintiffs to their proofs.
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1 46. As to paragraph 46, the ASHA Defendants neither admit nor deny
2 the allegations for lack of knowledge and therefore deny the allegations and
3 therefore leave Plaintiffs to their proofs.
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5 47. As to paragraph 47, the ASHA Defendants neither admit nor deny
6 the allegations for lack of knowledge and therefore deny the allegations and
7 therefore leave Plaintiffs to their proofs.
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9 48. As to paragraph 48, the ASHA Defendants neither admit nor deny
10 the allegations for lack of knowledge and therefore deny the allegations and
11 therefore leave Plaintiffs to their proofs.
12

13 49. As to paragraph 49, the ASHA Defendants neither admit nor deny
14 the allegations for lack of knowledge and therefore deny the allegations and
15 therefore leave Plaintiffs to their proofs.
16

17 50. As to paragraph 50, the ASHA Defendants neither admit nor deny
18 the allegations for lack of knowledge and therefore deny the allegations and
19 therefore leave Plaintiffs to their proofs.
20

21 51. As to paragraph 51, the ASHA Defendants neither admit nor deny
22 the allegations for lack of knowledge and therefore deny the allegations and
23 therefore leave Plaintiffs to their proofs.
24

25 52. As to paragraph 52, the ASHA Defendants neither admit nor deny
26 the allegations for lack of knowledge and therefore deny the allegations and
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1 therefore leave Plaintiffs to their proofs.

2 53. As to paragraph 53, the ASHA Defendants neither admit nor deny
3 the allegations for lack of knowledge and therefore deny the allegations and
4 therefore leave Plaintiffs to their proofs.
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6 54. As to paragraph 54, the ASHA Defendants neither admit nor deny
7 the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs.
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10 55. As to paragraph 55, the ASHA Defendants neither admit nor deny
11 the allegations for lack of knowledge and therefore deny the allegations and
12 therefore leave Plaintiffs to their proofs.
13

14 56. As to paragraph 48, the ASHA Defendants neither admit nor deny
15 the allegations for lack of knowledge and therefore deny the allegations and
16 therefore leave Plaintiffs to their proofs.
17

18 57. As to paragraph 57, the ASHA Defendants neither admit nor deny
19 the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.
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22 58. As to paragraph 58, the ASHA Defendants neither admit nor deny
23 the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.
25

26 59. As to paragraph 59, the ASHA Defendants neither admit nor deny
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1 the allegations for lack of knowledge and therefore deny the allegations and
2 therefore leave Plaintiffs to their proofs.
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4 60. As to paragraph 60, the ASHA Defendants neither admit nor deny
5 the allegations for lack of knowledge and therefore deny the allegations and
6 therefore leave Plaintiffs to their proofs.
7

8 61. As to paragraph 61, the ASHA Defendants neither admit nor deny
9 the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.
11

12 62. As to paragraph 62, the ASHA Defendants neither admit nor deny
13 the allegations for lack of knowledge and therefore deny the allegations and
14 therefore leave Plaintiffs to their proofs.
15

16 63. As to paragraph 63, the ASHA Defendants neither admit nor deny
17 the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.
19

20 64. As to paragraph 64, the ASHA Defendants neither admit nor deny
21 the allegations for lack of knowledge and therefore deny the allegations and
22 therefore leave Plaintiffs to their proofs.
23

24 65. As to paragraph 65, the ASHA Defendants neither admit nor deny
25 the allegations for lack of knowledge and therefore deny the allegations and
26 therefore leave Plaintiffs to their proofs.
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1 66. As to paragraph 66, the ASHA Defendants neither admit nor deny
2 the allegations for lack of knowledge and therefore deny the allegations and
3 therefore leave Plaintiffs to their proofs.
4

5 67. As to paragraph 67, the ASHA Defendants neither admit nor deny
6 the allegations for lack of knowledge and therefore deny the allegations and
7 therefore leave Plaintiffs to their proofs.
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9 68. As to paragraph 68, the ASHA Defendants neither admit nor deny
10 the allegations for lack of knowledge and therefore deny the allegations and
11 therefore leave Plaintiffs to their proofs.
12

13 69. As to paragraph 69, the ASHA Defendants neither admit nor deny
14 the allegations for lack of knowledge and therefore deny the allegations and
15 therefore leave Plaintiffs to their proofs.
16

17 70. As to paragraph 70, the ASHA Defendants neither admit nor deny
18 the allegations for lack of knowledge and therefore deny the allegations and
19 therefore leave Plaintiffs to their proofs.
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21 71. As to paragraph 71, the ASHA Defendants neither admit nor deny
22 the allegations for lack of knowledge and therefore deny the allegations and
23 therefore leave Plaintiffs to their proofs.
24

25 72. As to paragraph 72, the ASHA Defendants neither admit nor deny
26 the allegations for lack of knowledge and therefore deny the allegations and
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1 therefore leave Plaintiffs to their proofs.

2 73. As to paragraph 73, the ASHA Defendants neither admit nor deny
3 the allegations for lack of knowledge and therefore deny the allegations and
4 therefore leave Plaintiffs to their proofs.
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6 74. As to paragraph 74, the ASHA Defendants neither admit nor deny
7 the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs.
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10 75. As to paragraph 75, the ASHA Defendants neither admit nor deny
11 the allegations for lack of knowledge and therefore deny the allegations and
12 therefore leave Plaintiffs to their proofs.
13

14 76. As to paragraph 76, the ASHA Defendants neither admit nor deny
15 the allegations for lack of knowledge and therefore deny the allegations and
16 therefore leave Plaintiffs to their proofs.
17

18 77. As to paragraph 77, the ASHA Defendants neither admit nor deny
19 the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.
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22 78. As to paragraph 78, the ASHA Defendants neither admit nor deny
23 the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.
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26 79. As to paragraph 79, the ASHA Defendants neither admit nor deny
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1 the allegations for lack of knowledge and therefore deny the allegations and
2 therefore leave Plaintiffs to their proofs.

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4 80. As to paragraph 80, the ASHA Defendants neither admit nor deny
5 the allegations for lack of knowledge and therefore deny the allegations and
6 therefore leave Plaintiffs to their proofs.

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8 81. As to paragraph 81, the ASHA Defendants neither admit nor deny
9 the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.

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12 82. As to paragraph 82, the ASHA Defendants neither admit nor deny
13 the allegations for lack of knowledge and therefore deny the allegations and
14 therefore leave Plaintiffs to their proofs.

15
16 83. As to paragraph 83, the ASHA Defendants neither admit nor deny
17 the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.

19
20 84. As to paragraph 84, The ASHA Defendants admit same.

21
22 85. As to paragraph 85, the ASHA Defendants neither admit nor deny
23 the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.

25
26 86. As to paragraph 86, the ASHA Defendants neither admit nor deny
27 the allegations for lack of knowledge and therefore deny the allegations and
28

1 therefore leave Plaintiffs to their proofs.

2 87. As to paragraph 87, the ASHA Defendants neither admit nor deny
3 the allegations for lack of knowledge and therefore deny the allegations and
4 therefore leave Plaintiffs to their proofs.
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6 88. As to paragraph 88, the ASHA Defendants neither admit nor deny
7 the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs.
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10 89. As to paragraph 89, the ASHA Defendants neither admit nor deny
11 the allegations for lack of knowledge and therefore deny the allegations and
12 therefore leave Plaintiffs to their proofs.
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14 90. As to paragraph 90, the ASHA Defendants neither admit nor deny
15 the allegations for lack of knowledge and therefore deny the allegations and
16 therefore leave Plaintiffs to their proofs.
17

18 91. As to paragraph 91, the ASHA Defendants neither admit nor deny
19 the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.
21

22 92. As to paragraph 92, the ASHA Defendants neither admit nor deny
23 the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.
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26 93. As to paragraph 93, the ASHA Defendants neither admit nor deny
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1 the allegations for lack of knowledge and therefore deny the allegations and
2 therefore leave Plaintiffs to their proofs.

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4 94. As to paragraph 94, the ASHA Defendants neither admit nor deny
5 the allegations for lack of knowledge and therefore deny the allegations and
6 therefore leave Plaintiffs to their proofs.

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8 95. As to paragraph 95, the ASHA Defendants neither admit nor deny
9 the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.

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12 96. As to paragraph 96, the ASHA Defendants neither admit nor deny
13 the allegations for lack of knowledge and therefore deny the allegations and
14 therefore leave Plaintiffs to their proofs.

15
16 97. As to paragraph 97, the ASHA Defendants neither admit nor deny
17 the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.

19
20 98. As to paragraph 98, the ASHA Defendants neither admit nor deny
21 the allegations for lack of knowledge and therefore deny the allegations and
22 therefore leave Plaintiffs to their proofs.

23
24 99. As to paragraph 99, the ASHA Defendants neither admit nor deny
25 the allegations for lack of knowledge and therefore deny the allegations and
26 therefore leave Plaintiffs to their proofs.

1 100. As to paragraph 100, the ASHA Defendants neither admit nor deny
2 the allegations for lack of knowledge and therefore deny the allegations and
3 therefore leave Plaintiffs to their proofs.
4

5 101. As to paragraph 101, the ASHA Defendants neither admit nor
6 deny the allegations for lack of knowledge and therefore deny the allegations and
7 therefore leave Plaintiffs to their proofs.
8

9 102. As to paragraph 102, the ASHA Defendants admit same.
10

11 103. As to paragraph 103, the ASHA Defendants admit same.
12

13 104. As to paragraph 104, the ASHA Defendants neither admit nor
14 deny the allegations for lack of knowledge and therefore deny the allegations and
15 therefore leave Plaintiffs to their proofs.

16 105. As to paragraph 105, the ASHA Defendants neither admit nor
17 deny the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.
19

20 106. As to paragraph 106, the ASHA Defendants neither admit nor
21 deny the allegations for lack of knowledge and therefore deny the allegations and
22 therefore leave Plaintiffs to their proofs.
23

24 107. As to paragraph 107, the ASHA Defendants neither admit nor
25 deny the allegations for lack of knowledge and therefore deny the allegations and
26 therefore leave Plaintiffs to their proofs.
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1 108. As to paragraph 108, the ASHA Defendants neither admit nor
2 deny the allegations for lack of knowledge and therefore deny the allegations and
3 therefore leave Plaintiffs to their proofs.
4

5 109. As to paragraph 109, the ASHA Defendants neither admit nor
6 deny the allegations for lack of knowledge and therefore deny the allegations and
7 therefore leave Plaintiffs to their proofs.
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9 110. As to paragraph 110, the ASHA Defendants neither admit nor
10 deny the allegations for lack of knowledge and therefore deny the allegations and
11 therefore leave Plaintiffs to their proofs.
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13 111. As to paragraph 111, the ASHA Defendants neither admit nor
14 deny the allegations for lack of knowledge and therefore deny the allegations and
15 therefore leave Plaintiffs to their proofs.
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17 112. As to paragraph 112, the ASHA Defendants neither admit nor
18 deny the allegations for lack of knowledge and therefore deny the allegations and
19 therefore leave Plaintiffs to their proofs.
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21 113. As to paragraph 113, the ASHA Defendants neither admit nor
22 deny the allegations for lack of knowledge and therefore deny the allegations and
23 therefore leave Plaintiffs to their proofs.
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25 114. As to paragraph 114, the ASHA Defendants neither admit nor
26 deny the allegations for lack of knowledge and therefore deny the allegations and
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1 therefore leave Plaintiffs to their proofs.

2 115. As to paragraph 115, the ASHA Defendants neither admit nor
3 deny the allegations for lack of knowledge and therefore deny the allegations and
4 therefore leave Plaintiffs to their proofs.
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6 116. As to paragraph 116, the ASHA Defendants neither admit nor
7 deny the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs.
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10 117. As to paragraph 117, the ASHA Defendants neither admit nor
11 deny the allegations for lack of knowledge and therefore deny the allegations and
12 therefore leave Plaintiffs to their proofs.
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14 118. As to paragraph 118, the ASHA Defendants neither admit nor
15 deny the allegations for lack of knowledge and therefore deny the allegations and
16 therefore leave Plaintiffs to their proofs.
17

18 119. As to paragraph 119, the ASHA Defendants neither admit nor
19 deny the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.
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22 120. As to paragraph 120, the ASHA Defendants neither admit nor
23 deny the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.
25

26 121. As to paragraph 121, the ASHA Defendants neither admit nor
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28

1 deny the allegations for lack of knowledge and therefore deny the allegations and
2 therefore leave Plaintiffs to their proofs.

3
4 122. As to paragraph 122, the ASHA Defendants neither admit nor
5 deny the allegations for lack of knowledge and therefore deny the allegations and
6 therefore leave Plaintiffs to their proofs.

7
8 123. As to paragraph 123, the ASHA Defendants neither admit nor
9 deny the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.

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12 124. As to paragraph 124, the ASHA Defendants neither admit nor
13 deny the allegations for lack of knowledge and therefore deny the allegations and
14 therefore leave Plaintiffs to their proofs.

15
16 125. As to paragraph 125, the ASHA Defendants neither admit nor
17 deny the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.

19
20 126. As to paragraph 126, the ASHA Defendants neither admit nor
21 deny the allegations for lack of knowledge and therefore deny the allegations and
22 therefore leave Plaintiffs to their proofs.

23
24 127. As to paragraph 127, the ASHA Defendants neither admit nor
25 deny the allegations for lack of knowledge and therefore deny the allegations and
26 therefore leave Plaintiffs to their proofs.

1 128. As to paragraph 128, the ASHA Defendants neither admit nor
2 deny the allegations for lack of knowledge and therefore deny the allegations and
3 therefore leave Plaintiffs to their proofs.
4

5 129. As to paragraph 129, the ASHA Defendants neither admit nor
6 deny the allegations for lack of knowledge and therefore deny the allegations and
7 therefore leave Plaintiffs to their proofs.
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9 130. As to paragraph 130, the ASHA Defendants neither admit nor
10 deny the allegations for lack of knowledge and therefore deny the allegations and
11 therefore leave Plaintiffs to their proofs.
12

13 131. As to paragraph 131, the ASHA Defendants neither admit nor
14 deny the allegations for lack of knowledge and therefore deny the allegations and
15 therefore leave Plaintiffs to their proofs.
16

17 132. As to paragraph 132, the ASHA Defendants neither admit nor
18 deny the allegations for lack of knowledge and therefore deny the allegations and
19 therefore leave Plaintiffs to their proofs.
20

21 133. As to paragraph 133, the ASHA Defendants neither admit nor
22 deny the allegations for lack of knowledge and therefore deny the allegations and
23 therefore leave Plaintiffs to their proofs.
24

25 134. As to paragraph 134, the ASHA Defendants neither admit nor
26 deny the allegations for lack of knowledge and therefore deny the allegations and
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28

1 therefore leave Plaintiffs to their proofs.

2 135. As to paragraph 135, the ASHA Defendants neither admit nor
3 deny the allegations for lack of knowledge and therefore deny the allegations and
4 therefore leave Plaintiffs to their proofs.
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6 136. As to paragraph 136, the ASHA Defendants neither admit nor
7 deny the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs.
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10 137. As to paragraph 137, the ASHA Defendants neither admit nor
11 deny the allegations for lack of knowledge and therefore deny the allegations and
12 therefore leave Plaintiffs to their proofs.
13

14 138. As to paragraph 138, the ASHA Defendants neither admit nor
15 deny the allegations for lack of knowledge and therefore deny the allegations and
16 therefore leave Plaintiffs to their proofs.
17

18 139. As to paragraph 139, the ASHA Defendants neither admit nor
19 deny the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.
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22 140. As to paragraph 140, the ASHA Defendants neither admit nor
23 deny the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.
25

26 141. As to paragraph 141, the ASHA Defendants neither admit nor
27
28

1 deny the allegations for lack of knowledge and therefore deny the allegations and
2 therefore leave Plaintiffs to their proofs.

3
4 142. As to paragraph 142, the ASHA Defendants neither admit nor
5 deny the allegations for lack of knowledge and therefore deny the allegations and
6 therefore leave Plaintiffs to their proofs.

7
8 143. As to paragraph 143, the ASHA Defendants neither admit nor
9 deny the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.

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12 144. As to paragraph 144, the ASHA Defendants neither admit nor
13 deny the allegations for lack of knowledge and therefore deny the allegations and
14 therefore leave Plaintiffs to their proofs.

15
16 145. As to paragraph 145, the ASHA Defendants neither admit nor
17 deny the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.

19
20 146. As to paragraph 146, the ASHA Defendants neither admit nor
21 deny the allegations for lack of knowledge and therefore deny the allegations and
22 therefore leave Plaintiffs to their proofs.

23
24 147. As to paragraph 147, the ASHA Defendants neither admit nor
25 deny the allegations for lack of knowledge and therefore deny the allegations and
26 therefore leave Plaintiffs to their proofs.

1 148. As to paragraph 148, the ASHA Defendants neither admit nor
2 deny the allegations for lack of knowledge and therefore deny the allegations and
3 therefore leave Plaintiffs to their proofs.
4

5 149. As to paragraph 149, the ASHA Defendants neither admit nor
6 deny the allegations for lack of knowledge and therefore deny the allegations and
7 therefore leave Plaintiffs to their proofs.
8

9 150. As to paragraph 150, the ASHA Defendants neither admit nor
10 deny the allegations for lack of knowledge and therefore deny the allegations and
11 therefore leave Plaintiffs to their proofs.
12

13 151. As to paragraph 151, the ASHA Defendants deny same as untrue.
14

15 152. As to paragraph 152, the ASHA Defendants deny the allegations
16 in the form and manner alleged but informatively indicate that the online
17 promotional advertising speak for themselves.
18

19 153. As to paragraph 153, the ASHA Defendants neither admit nor
20 deny the allegations for lack of knowledge and therefore deny the allegations and
21 therefore leave Plaintiffs to their proofs.
22

23 154. As to paragraph 154, the ASHA Defendants neither admit nor
24 deny the allegations for lack of knowledge and therefore deny the allegations and
25 therefore leave Plaintiffs to their proofs.
26

27 155. As to paragraph 155, the ASHA Defendants neither admit nor
28

1 deny the allegations for lack of knowledge and therefore deny the allegations and
2 therefore leave Plaintiffs to their proofs.

3
4 156. As to paragraph 156, the ASHA Defendants neither admit nor
5 deny the allegations for lack of knowledge and therefore deny the allegations and
6 therefore leave Plaintiffs to their proofs.

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8 157. As to paragraph 157, the ASHA Defendants neither admit nor
9 deny the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.

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12 158. As to paragraph 158, the ASHA Defendants neither admit nor
13 deny the allegations for lack of knowledge and therefore deny the allegations and
14 therefore leave Plaintiffs to their proofs.

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16 159. As to paragraph 159, the ASHA Defendants neither admit nor
17 deny the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.

19
20 160. As to paragraph 160, the ASHA Defendants neither admit nor
21 deny the allegations for lack of knowledge and therefore deny the allegations and
22 therefore leave Plaintiffs to their proofs.

23
24 161. As to paragraph 161, the ASHA Defendants neither admit nor
25 deny the allegations for lack of knowledge and therefore deny the allegations and
26 therefore leave Plaintiffs to their proofs.

1 162. As to paragraph 162, the ASHA Defendants neither admit nor
2 deny the allegations for lack of knowledge and therefore deny the allegations and
3 therefore leave Plaintiffs to their proofs.
4

5 163. As to paragraph 163, the ASHA Defendants neither admit nor
6 deny the allegations for lack of knowledge and therefore deny the allegations and
7 therefore leave Plaintiffs to their proofs.
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9 164. As to paragraph 164, the ASHA Defendants neither admit nor
10 deny the allegations for lack of knowledge and therefore deny the allegations and
11 therefore leave Plaintiffs to their proofs.
12

13 165. As to paragraph 165, the ASHA Defendants neither admit nor
14 deny the allegations for lack of knowledge and therefore deny the allegations and
15 therefore leave Plaintiffs to their proofs.
16

17 166. As to paragraph 166, the ASHA Defendants neither admit nor
18 deny the allegations for lack of knowledge and therefore deny the allegations and
19 therefore leave Plaintiffs to their proofs.
20

21 167. As to paragraph 167, the ASHA Defendants neither admit nor
22 deny the allegations for lack of knowledge and therefore deny the allegations and
23 therefore leave Plaintiffs to their proofs.
24

25 168. As to paragraph 168, the ASHA Defendants neither admit nor
26 deny the allegations for lack of knowledge and therefore deny the allegations and
27
28

1 therefore leave Plaintiffs to their proofs.

2 169. As to paragraph 169, the ASHA Defendants neither admit nor
3 deny the allegations for lack of knowledge and therefore deny the allegations and
4 therefore leave Plaintiffs to their proofs.
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6 170. As to paragraph 170, the ASHA Defendants neither admit nor
7 deny the allegations for lack of knowledge and therefore deny the allegations and
8 therefore leave Plaintiffs to their proofs.
9

10 171. As to paragraph 171, the ASHA Defendants neither admit nor
11 deny the allegations for lack of knowledge and therefore deny the allegations and
12 therefore leave Plaintiffs to their proofs.
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14 172. As to paragraph 172, the ASHA Defendants neither admit nor
15 deny the allegations for lack of knowledge and therefore deny the allegations and
16 therefore leave Plaintiffs to their proofs.
17

18 173. As to paragraph 173, the ASHA Defendants neither admit nor
19 deny the allegations for lack of knowledge and therefore deny the allegations and
20 therefore leave Plaintiffs to their proofs.
21

22 174. As to paragraph 174, the ASHA Defendants neither admit nor
23 deny the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.
25

26 175. As to paragraph 175, the ASHA Defendants admit same.
27
28

1 176. As to paragraph 176, the ASHA Defendants deny the allegations
2 in the form and manner alleged; admit that Defendant Bhalla is an owner of Asha
3 Media and denies the balance of the allegations in the form and manner alleged.
4

5 177. As to paragraph 177, the ASHA Defendants deny the allegations
6 in the form and manner alleged.
7

8 178. As to paragraph 178, the ASHA Defendants admit same.

9 179. As to paragraph 179, the ASHA Defendants admit that the quoted
10 language appears on Asha Media's homepage but denies the balance of the
11 allegations in the form and manner as alleged as untrue.
12

13 180. As to paragraph 180, the ASHA Defendants deny the allegations
14 as untrue in the form and manner alleged.
15

16 181. As to paragraph 181, the ASHA Defendants neither admit nor
17 deny the allegations for lack of knowledge and therefore deny the allegations and
18 therefore leave Plaintiffs to their proofs.
19

20 182. As to paragraph 182, the ASHA Defendants admit that the quoted
21 words are accurately quoted but deny the balance of the allegations in the form
22 and manner alleged as untrue.
23

24 183. As to paragraph 183, the ASHA Defendants neither admit nor
25 deny the allegations for lack of knowledge and therefore deny the allegations and
26 therefore leave Plaintiffs to their proofs.
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28

1 184. As to paragraph 184, the ASHA Defendants neither admit nor
2 deny the allegations for lack of knowledge and therefore deny the allegations and
3 therefore leave Plaintiffs to their proofs.
4

5 185. As to paragraph 185, the ASHA Defendants admit same.
6

7 186. As to paragraph 186, the ASHA Defendants neither admit nor
8 deny the allegations for lack of knowledge and therefore deny the allegations and
9 therefore leave Plaintiffs to their proofs.
10

11 187. As to paragraph 187, the ASHA Defendants neither admit nor
12 deny the allegations for lack of knowledge and therefore deny the allegations and
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15 188. As to paragraph 188, the ASHA Defendants neither admit nor
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23 190. As to paragraph 190, the ASHA Defendants neither admit nor
24 deny the allegations for lack of knowledge and therefore deny the allegations and
25 therefore leave Plaintiffs to their proofs.
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27 191. As to paragraph 191, the ASHA Defendants neither admit nor
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4 192. As to paragraph 192, the ASHA Defendants neither admit nor
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8 193. As to paragraph 193, the ASHA Defendants neither admit nor
9 deny the allegations for lack of knowledge and therefore deny the allegations and
10 therefore leave Plaintiffs to their proofs.

11
12 194. As to paragraph 194, the ASHA Defendants neither admit nor
13 deny the allegations for lack of knowledge and therefore deny the allegations and
14 therefore leave Plaintiffs to their proofs.

15
16 195. As to paragraph 195, the ASHA Defendants admit receipt of the
17 cease-and-desist letters referenced but deny the balance of the allegations in the
18 form and manner alleged as untrue.

19
20 196. As to paragraph 196, the ASHA Defendants admit same.

21
22 197. As to paragraph 197, the ASHA Defendants neither admit nor
23 deny the allegations for lack of knowledge and therefore deny the allegations and
24 therefore leave Plaintiffs to their proofs.

25
26 198. As to paragraph 198, the ASHA Defendants neither admit nor
27 deny the allegations for lack of knowledge and therefore deny the allegations and
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1 therefore leave Plaintiffs to their proofs.

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22 204. As to paragraph 204, the ASHA Defendants neither admit nor
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21 257. As to paragraph 257, the ASHA Defendants neither admit nor
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24

25 258. As to paragraph 258, the ASHA Defendants deny the allegations
26 as untrue in the form and manner alleged.
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2 as untrue in the form and manner alleged.

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22 deny the allegations for lack of knowledge and therefore deny the allegations and
23 therefore leave Plaintiffs to their proofs.
24

25 **REQUEST FOR RELIEF**
26

27 WHEREFORE, the ASHA Defendants pray that this Court deny all of
28

1 the relief requested by the Plaintiffs and award Asha Defendants their statutory
2 costs and attorney fees as well as costs and attorney fees as the Court deems just
3 and proper in this matter.
4

5 Respectfully submitted this 23rd day of April, 2015.

6 /s/Adrianos Facchetti
7

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11 Tel.: (626) 793-8607
12 Fax: (626) 793-7293
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13 Mark G. Clark (*Pro Hac Vice* pending)
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16 Traverse City, Michigan 49684
17 Tel.: (231) 932-0411
18 Fax: (231) 932-0636
mark@traverselegal.com

19 *Attorneys for Defendants Asha and Bhalla*

20
21 **ASHA DEFENDANTS' AFFIRMATIVE DEFENSES**

22 1. Plaintiffs' equitable claims, including requests for injunctive relief
23 are barred under the Doctrine of Laches.
24

25 2. Plaintiffs have failed to state a claim upon which relief may be
26 granted against Defendant Bhalla under an "alter ego" theory of liability.
27

28 3. Venue is not proper as it is inconvenient for litigating in this Court

1 due to the location of the parties and witnesses who are located outside of the
2 jurisdiction of the Court.

3
4 4. Plaintiffs' requested relief is barred under the Doctrine of Unclean
5 Hands based upon facts and circumstances to be determined in discovery.

6 5. Plaintiffs' claims for damages are limited by 15 U.S.C. Section 1111.

7
8 Defendant reserves the right to add additional Affirmative Defenses that
9 become known through discovery.

10
11
12 Respectfully submitted this 23rd day of April, 2015.

13 /s/Adrianos Facchetti

14
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Attorneys for Defendants Asha and Bhalla

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of April, 2015, I electronically filed the foregoing Answer to Complaint and Affirmative Defenses with the Clerk of the Court using the CM/ECF System.

/s/Adrianos Facchetti

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